

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

Prosecution Disclosure of
Giglio Material

15 October 2012

On 22 June 2012, the United States submitted its initial Witness List in the above referenced court-martial. *See* Appellate Exhibit (AE) CLXII. On 14 August 2012 and 4 September 2012, the United States submitted its Witness Lists regarding Article 13, Uniform Code of Military Justice (UCMJ). *See* Appellate Exhibit CCXXXIX. Beginning in July 2012, the United States began requesting any impeachment materials for witnesses not being offered purely for authentication purposes. The United States requested that the departments, agencies, organizations, and military commands, to which the government witnesses are employed or assigned, conduct a thorough and comprehensive search of their own records for impeachment material and disclose any responsive records. *See* enclosed sample *Giglio* request; *see also* *Giglio v. United States*, 405 U.S. 150 (1972).

As of 15 October 2012, the United States has reviewed its own files and records received in response to its requests. In addition to prior disclosures, the United States discloses the following and makes available for inspection all discoverable material:

1. (b) (6). The prosecution did not find any such material relating to this witness.
2. (b) (6). In addition to disclosure(s) already provided, any material relating to this witness is available for inspection with the prosecution.
3. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
4. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
5. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
6. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

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7. (b) (6). Any material relating to this witness is available for inspection with the prosecution.
8. (b) (6). Any material relating to this witness is available for inspection with the prosecution.
9. (b) (6). The prosecution did not find any such material relating to this witness.
10. (b) (6). The prosecution did not find any such material relating to this witness.
11. (b) (6). The prosecution did not find any such material relating to this witness.
12. (b) (6). The prosecution did not find any such material relating to this witness.
13. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
14. (b) (6). The prosecution did not find any such material relating to this witness.
15. (b) (6). Any material relating to this witness is available for inspection with the prosecution.
16. (b) (6). The prosecution did not find any such material relating to this witness.
17. (b) (6). The prosecution did not find any such material relating to this witness.
18. (b) (6). The prosecution did not find any such material relating to this witness.
19. (b) (6). The prosecution did not find any such material relating to this witness.
20. (b) (6). The prosecution did not find any such material relating to this witness.
21. (b) (6). The prosecution did not find any such material relating to this witness.
22. (b) (6) prosecution did not find any such material relating to this witness.
23. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

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24. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
25. (b) (6). The prosecution did not find any such material relating to this witness.
26. [REDACTED]. The prosecution did not find any such material relating to this witness.
27. (b) (6). The prosecution did not find any such material relating to this witness.
28. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
29. (b) (6). The prosecution did not find any such material relating to this witness.
30. (b) (6). The prosecution did not find any such material relating to this witness.
31. (b) (6). The prosecution did not find any such material relating to this witness.
32. (b) (7)(A). The prosecution did not find any such material relating to this witness.
33. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.
34. (b) (6). Any material relating to this witness is available for inspection with the prosecution.

- (b) (6). The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this witness.
- [REDACTED]. The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this witness.
- [REDACTED] The prosecution did not find any such material relating to this

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45. (b) (6). The prosecution did not find any such material relating to this witness.

46. (b) (6). The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

47. (b) (6) prosecution did not find any such material relating to this witness.

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49. (b) (6). The prosecution did not find any such material relating to this witness.

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[REDACTED] The prosecution did not find any such material relating to this witness.

65. [REDACTED]. Any material relating to this witness is available for inspection with the prosecution.

66. SGT [REDACTED] The prosecution did not find any such material relating to this witness.

67. M [REDACTED] The prosecution did not find any such material relating to this witness.

68. [REDACTED] The prosecution did not find any such material relating to this witness.

69. [REDACTED] The prosecution did not find any such material relating to this witness.

70. [REDACTED] The prosecution did not find any such material relating to this witness.

71. [REDACTED] The prosecution did not find any such material relating to this witness.

72. [REDACTED] The prosecution did not find any such material relating to this witness.

73. [REDACTED] The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

[REDACTED] The prosecution did not find any such material relating to this witness.

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79. [REDACTED]. The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

80. [REDACTED]. Any material relating to this witness is available for inspection with the prosecution.

81. [REDACTED]. The prosecution did not find any such material relating to this witness.

82. [REDACTED]. The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

[REDACTED] he prosecution did not find any such material relating to this witness.

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90. [REDACTED]. The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

91. [REDACTED]. The prosecution did not find any such material relating to this witness.

92. [REDACTED]. The prosecution did not find any such material relating to this witness.

93. [REDACTED]. Any material relating to this witness is available for inspection with the prosecution.

94. [REDACTED]. The prosecution will coordinate with the particular department, agency, organization, or military command for any impeachment material. Should any

impeachment material be found, the prosecution immediately will make such material available for inspection.

95. [REDACTED] The prosecution did not find any such material relating to this witness.

96. [REDACTED] The prosecution did not find any such material relating to this witness.

97. [REDACTED] The prosecution did not find any such material relating to this witness.

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99. [REDACTED] The prosecution did not find any such material relating to this witness.

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101. [REDACTED] Any material relating to this witness is available for inspection with the prosecution.

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109. [REDACTED]. The prosecution did not find any such material relating to this witness.

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111. [REDACTED]. Any material relating to this witness is available for inspection with the prosecution.

[REDACTED] he prosecution did not find any such material relating to this witness.

[REDACTED] The prosecution will coordinate with the particular department, military command for any impeachment material. Should any impeachment material be found, the prosecution immediately will make such material available for inspection.

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Article 13 Witnesses:

[REDACTED] Any material relating to this witness is available for inspection

[REDACTED] The prosecution did not find any such material relating to this

[REDACTED] prosecution did not find any such material relating to this witness.

[REDACTED] The prosecution did not find any such material relating to this witness.

126. [REDACTED]. The prosecution did not find any such material relating to this witness.

127. [REDACTED] The prosecution did not find any such material relating to this witness.

[REDACTED]. The prosecution did not find any such material relating to this witness.

129. [REDACTED]. The prosecution did not find any such material relating to this witness.

130. [REDACTED] The prosecution did not find any such material relating to this witness.

[REDACTED] The prosecution did not find any such material relating to this witness.

[REDACTED] The prosecution did not find any such material relating to this witness.

133. [REDACTED]. The prosecution did not find any such material relating to this witness.

134. [REDACTED] The prosecution did not find any such material relating to this witness.

135. [REDACTED]. The prosecution did not find any such material relating to this witness.

136. [REDACTED]. The prosecution did not find any such material relating to this witness.

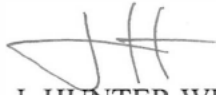
137. [REDACTED]. The prosecution did not find any such material relating to this witness.

138. [REDACTED] The prosecution did not find any such material relating to this witness.

139. [REDACTED]. Any material relating to this witness is available for inspection with the prosecution.

The United States acknowledges its continuing obligation to make available additional impeachment information if it is discovered.

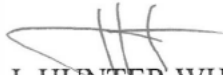
The United States will request impeachment material for its Article 10 witnesses and make any responsive material available for inspection.



J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel

Enclosure

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel via electronic mail, on 15 October 2012.



J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel